

**IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA**

ROBERT J. TURCO,)	CIVIL ACTION NO. 2:19-cv-00174-JFC
)	
Plaintiff,)	
)	
v.)	
)	
ZAMBELLI FIREWORKS)	
MANUFACTURING CO.,)	
)	
Defendant.)	

CONSENT MOTION TO AMEND COMPLAINT

Plaintiff, Robert J. Turco, by and through his attorneys, files this motion seeking leave of Court to file an Amended Complaint, and in support thereof states as follows:

1. Plaintiff seeks to file an Amended Complaint in order to add three counts under the Pennsylvania Human Relations Act. The proposed Amended Complaint is attached as Exhibit A.

2. Defendant consents to this Motion.

3. Under the Court's Case Management Order, entered May 16, 2019, the deadline to amend the pleadings is today, June 17, 2019.

For the reasons set forth above, Plaintiff requests leave to file the proposed Amended Complaint, attached as Exhibit A.

Date: June 17, 2019

Respectfully submitted,

s/ David B. Spear

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s/ Manning J. O'Connor II

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